

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CIMC RAFFLES OFFSHORE (SINGAPORE)  
LIMITED, and YANTAI CIMC RAFFLES  
OFFSHORE LIMITED,

Petitioners,

- against -

SCHAHIN HOLDING S.A., SCHAHIN  
ENGENHARIA S.A., SEA BISCUIT  
INTERNATIONAL INC., BLACK GOLD  
DRILLING LLC, BAERFIELD DRILLING LLC,  
and SORATU DRILLING LLC,

Respondents.

Civil Action No.: 1:13-cv-00052-JSR  
ECF Case

Hon. Jed S. Rakoff

**NOTICE OF MOTION**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that, upon the Notice of Motion, Affirmation of Dan J. Schulman, dated April 9, 2013, and the accompanying Memorandum of Law in Support of CIMC Raffles' Motion for Post-Judgment Enforcement Pursuant to Fed. R. Civ. P. 69, and on all prior pleadings, proceedings, hearings, and papers had herein, and consistent with the directives issued at the conference held before the Court on April 9, 2013, Petitioners CIMC Raffles Offshore (Singapore) Limited and Yantai CIMC Raffles Offshore Limited will move before the Honorable Jed S. Rakoff, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 14B, New York, New York 10007, on April 16, 2013, at 11:00 a.m., or as soon as they may be heard, for an Order granting Defendant's motion to enforce the judgment rendered by this Court and entered by the Clerk on or about March 19, 2013 (the "Judgment") as against respondents Black Gold Drilling LLC ("Black Gold"), Baerfield Drilling LLC ("BDL") and Soratu Drilling LLC ("SDL") (collectively, "Judgment Debtors"), by directing:

- (1) Black Gold and its wholly owned subsidiary, BDL, jointly and severally, to turnover on or before April 16, 2013, cash or cash equivalents, bank deposits, or other funds to pay the Judgment, such sums to be paid in the approximate amount of \$46.961 million (\$46,094,027.32 + \$784,229.89 + 13,206.28 + \$350 + \$69,582.68 + post-judgment interest); and

Black Gold and its wholly owned subsidiary SDL, jointly and severally, to turnover on or before April 16, 2013, cash or cash equivalents, bank deposits, or other funds to pay the Judgment, such sums to be paid in the approximate amount of \$23.857 million (\$23,376,750.09 + \$397,724.98 + \$13,206.28 + \$350 + \$69,582.68 + post-judgment interest), for a grand total of approximately \$70.8 million plus interest owed by Black Gold; and

- (2) if sufficient funds are not turned over to satisfy the Judgment, directing Black Gold to turnover and transfer on or before April 16, 2013, all membership interests and ownership interests it holds in BDL and SDL to CIMC Raffles, and to execute all necessary documents to effect such transfers, on or before April 16, 2013; and issuing
- (3) a restraining order as against respondents Schahin Holding S.A. ("Schahin Holding"), Schahin Engenharia S.A. ("Schahin Engenharia") and Sea Biscuit International LLC ("Sea Biscuit") barring and restraining each of them from transferring or selling any of their property or assets, tangible or intangible, vested or unvested, pending entry of judgment, and ordering that such restraint continue until they have paid sums sufficient to fully satisfy the Judgment.

PLEASE TAKE FURTHER NOTICE that opposition papers shall be due on the return date.

Dated: New York, New York  
April 9, 2013

**SCHULMAN BLACKWELL LLP**



By: \_\_\_\_\_  
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TO: All Respondents Captioned Herein